



Thomas McC. Souther
Telephone: (646) 558-6052
souther@freehsporkinsullivan.com

Thomas McC. Souther
Freeh Sporkin & Sullivan, LLP
350 Fifth Avenue
Suite 6903
New York, New York 10118

July 1, 2019

BY ECF

The Honorable Joseph F. Bianco
United States Circuit Judge
U.S. District Court for the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States of America v. Kenner, et al, Cr. No. 13-607 (JFB)

Dear Judge Bianco:

Kevin P. Mulry of Farrell Fritz, P.C. and I represent Diamante Cabo San Lucas, LLC, Diamante Cabo San Lucas S. de R.L. de C.V., KAJ Holdings, LLC, Diamante Properties, LLC, and Kenneth A. Jowdy (together, the "DCSL Parties") in connection with the forfeiture proceeding in this case. I am writing regarding the Court's hearing in the above-referenced matter scheduled for July 2, 2019. The DCSL Parties continue to have objections to and concerns with the government's proposed Preliminary Orders of Forfeiture. Mr. Mulry and I plan to attend the conference tomorrow. We are available to address any questions the Court may have about the DCSL Parties' concerns with the government's proposed Preliminary Orders of Forfeiture, to the extent the Court plans to address the subject, and we would welcome the opportunity to do so.

I am advised that Marc Wolinsky, a homeowner at the Diamante Cabo San Lucas Resort, is unable to attend the conference on July 2, 2019, but he continues to object to the government's proposed Preliminary Orders of Forfeiture for the reasons set forth in his previous submissions to the Court.

Thank you for the Court's consideration.

Respectfully submitted,

/s/ Thomas McC. Souther

Thomas McC. Souther

cc: All parties of record via ECF
Doreen S. Martin, Esq. (By Email)
Kevin P. Mulry, Esq. (By Email)
Marc Wolinsky, Esq. (By Email)
Phillip A. Kenner (By first-class mail)